

HEALTH CARE SABOTAGE ONLINE:

A WARNING TO CONSUMERS

OCTOBER 2019



U.S. SENATOR BOB CASEY



FIGHTING *for* PENNSYLVANIA FAMILIES

HEALTH CARE SABOTAGE ONLINE: A WARNING TO CONSUMERS

OVERVIEW

While legislative avenues to repeal the Affordable Care Act (ACA) are all but closed, the Trump Administration continues to sabotage the health insurance coverage that individuals and families receive. This report describes the findings of an investigation conducted by the Office of U.S. Senator Bob Casey (D-PA) into how the Administration's sabotage is affecting consumers shopping online for health insurance. By documenting the types of health insurance plans that people in Pennsylvania typically find when searching for health coverage online, it demonstrates that, more often than not, individuals are bombarded by paid advertisements for health insurance meant to mislead and confuse unsuspecting shoppers. These advertisements have been shown to direct people into health coverage, often called "junk plans," that fail to meet the basic protections of the ACA, including failing to provide coverage to people with pre-existing conditions or protect those who become ill or injured from catastrophic out-of-pocket expenses. As such, this report serves as a caution to consumers seeking to purchase health coverage online.

The findings in this report serve as further evidence that the Trump Administration, by weakening consumer protections, has made it more challenging for individuals and families to secure affordable, comprehensive health care coverage.

The findings in this report also serve as further evidence that the Trump Administration, by weakening consumer protections, has made it more challenging for individuals and families to secure affordable, comprehensive health care coverage. The report recommends that the Administration reverse its harmful policy relating to "junk plans," rather than continuing to enable this market to grow and flourish. Absent action to rein in these junk plans, more unsuspecting individuals and families will likely be confronted with extreme out-of-pocket costs, or worse, bankrupted due to their health history or a health care event.



FINDINGS IN THIS REPORT

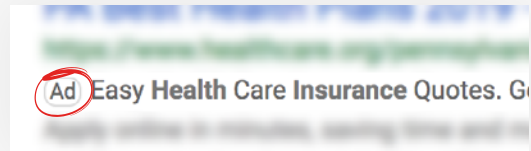
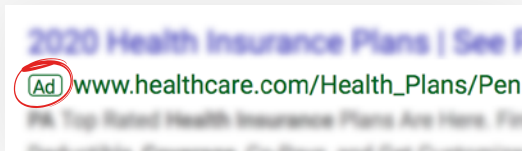
1. When searching online for health insurance plans, it is difficult to differentiate between paid advertisements and search results.
2. Paid advertisements for health insurance are often misleading and fail to fully disclose very important information.
3. Advertisements often use "HealthCare.Gov" in the website title and descriptions despite having no affiliation with HealthCare.Gov.

TIPS TO AVOID ENROLLING IN A JUNK PLAN

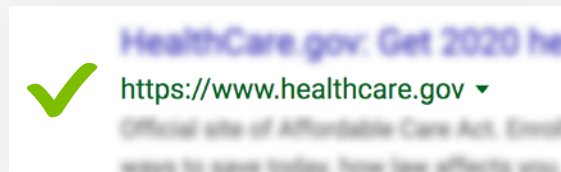
1. To get help picking the health insurance coverage that fits your needs, visit:

HealthCare.gov

2. Be aware of how the search engine designates advertisements.



3. Always look at the website address, typically displayed in green font, before clicking on a link.



4. Pay attention to the words used in the website title and description.



BACKGROUND

The Patient Protection and Affordable Care Act (ACA) provides individuals and families protections from insurance company abuses.¹ As a result of the law, people with pre-existing conditions cannot be denied coverage or charged more for coverage due to illness or injury. In addition, women cannot be charged more than men for coverage; there are limits on annual and lifetime out-of-pocket costs; and plans must include 10 essential health benefits, such as emergency room care and maternity care. As long as insurance plans meet these (and other) requirements, a plan is considered to be comprehensive and can be sold to individuals and families. These new consumer protections, and the availability of a federally operated, unbiased source for purchasing coverage, HealthCare.gov, ensures that insurance company executives can no longer prioritize profits over patients.

JUNK PLANS



These plans often fail to offer comprehensive coverage and are permitted to exclude coverage of pre-existing conditions. Incomplete health care coverage can leave an individual unprotected against the cost of an illness or injury.

To accommodate people who may be between jobs or who only require stop-gap coverage, the law allows for individuals to purchase “short term, limited duration health plans.”² These plans often fail to offer comprehensive coverage and are permitted to exclude coverage of pre-existing conditions. Incomplete health care coverage can leave an individual unprotected against the cost of an illness or injury. It is for this reason that these plans are often referred to as “junk plans.” In recognition of the shortcomings of these plans, in 2016, federal regulations were put in place that limited enrollment in these plans to three months.

Even with the significant risk such plans pose to individuals and families, in August 2018, the Trump Administration decided to allow individuals to purchase these junk plans for a full year, with an option of renewing that coverage for up to three years.³ These junk plans are not required to meet the standards set by the ACA and can leave individuals and families with unexpected health care needs with piles of costly health care bills. By expanding and promoting enrollment in junk plans, the Trump Administration gave the power back to insurance company executives to determine the adequacy of health care coverage. These actions take us back to the days when an individual may not be protected from extreme out-of-pocket costs in the case of an illness or injury.

Worse yet, the decision by the Trump Administration to allow these junk plans to be sold for 12 months (with options to extend) has enabled profit-driven insurance companies that are known to be predatory to flourish. This can be seen most clearly through the proliferation of misleading and confusing paid advertisements for junk plans online. As a result of these advertisements, consumers may not be able to distinguish between a junk plan and comprehensive coverage, and fall prey to the deceptive promotional practices of the companies selling these junk plans.⁴

1 See the Patient Protection and Affordable Care Act (Pub. L. No. 111-148) and the Health Care and Education Reconciliation Act (Pub. L. No. 111-152).

2 Understanding Short-term Limited Duration Health Insurance. Karen Pollitz-Michelle Long-Ashley Semanskee-Rabah Kamal - <https://www.kff.org/health-reform/issue-brief/understanding-short-term-limited-duration-health-insurance/>

3 Guidance issued by the Trump Administration in October 2018 relating to Section 1332 State Innovation Waivers also allows individuals to apply federal tax credits to the purchase of a junk plan. More can be found on www.CMS.gov.

4 Corlette, S., Lucia, K., Palanker, D., & Hoppe, O. (2019). The Marketing of Short-Term Health Plans: An Assessment of Industry Practices and State Regulatory Responses. The Urban Institute. Available from: https://www.urban.org/sites/default/files/publication/99708/moni_stldi_final_0.pdf.

This is what happened to Frank from Dover, Pennsylvania. In hopes of securing comprehensive coverage through the ACA, Frank took to the internet to review the options available through HealthCare.Gov. He was bombarded by advertisements. He thought that he sifted through the promotions and entered his information on HealthCare.Gov. Instead, he received a call from a broker who sold him a plan that promised to be “better than Obamacare.” Frank later learned that the “short term plan” he purchased did not cover pre-existing conditions, which became a problem after a lens from his cataract surgery 11 years ago detached. He needed medical treatment. It was only after appealing the decision and a complaint to the Pennsylvania Insurance Commissioner that he was able to get coverage for the health care service he needed.⁵

Not everyone is as lucky as Frank. The proliferation of these junk plans is affecting the health and well-being of Americans of all ages, from families and young adults to retirees and self-employed individuals.

The decision by the Trump Administration to allow these junk plans to be sold for 12 months (with options to extend) has enabled profit-driven insurers who are known to be predatory to flourish.

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INVESTIGATION

To document the impact of the decision by the Trump Administration to expand enrollment in junk plans, the Office of U.S. Senator Bob Casey conducted an investigation into the search results encountered by consumers looking for health insurance online. During July and August of 2019, staff conducted online searches in locations throughout Pennsylvania, including Philadelphia, Pittsburgh, Scranton, Erie, Harrisburg, and Bethlehem, using the nation’s three leading search engine websites: Google, Yahoo and Bing. Staff used terms that people might use when trying to find health insurance, including: “cheap health insurance,” “health insurance,” “HealthCare.Gov,” “affordable health insurance,” and “Obamacare.”⁶

The investigation found that across all of the search engines and search terms, individuals are bombarded by advertisements for websites that sell health insurance. Because of the decision by the Trump Administration to allow short term, limited duration health insurance plans, or junk plans, to be sold for up to three years, individuals are faced with the difficulty of sorting through scores of paid advertisements to find the federally operated website, HealthCare.Gov, and to understand the benefits and limitation of the insurance plans generated by their online searches.

⁵ K., Frank. (2019, October 16). Phone Interview with Casey Office Staff.
⁶ All search results on file with the Committee and available upon request.

FINDINGS

FINDING

When searching online for health insurance plans, it is **difficult to differentiate** between paid advertisements and search results.



The investigation found that most responses to internet searches produced paid advertisements in addition to the actual results that responded to the inquiry. It also revealed that the content, scale and placement of the paid advertisements can mislead an individual before they even reach actual search results.

Designation of Advertisements

Consumers may have difficulty differentiating between paid advertisements and search results that respond to their original inquiry because search engines have different ways of designating paid advertisements – some are clearer than others. Google and Bing designate paid advertisements with a small label that says “Ad,” colored green or grey, respectively. Yahoo, on the other hand, separates paid advertisements from search results with a thin grey line.

Figure 1. Google Search Result from Philadelphia, PA on July 31, 2019: There is a small green box around the word ‘Ad,’ which is also in green, underneath the title.⁷

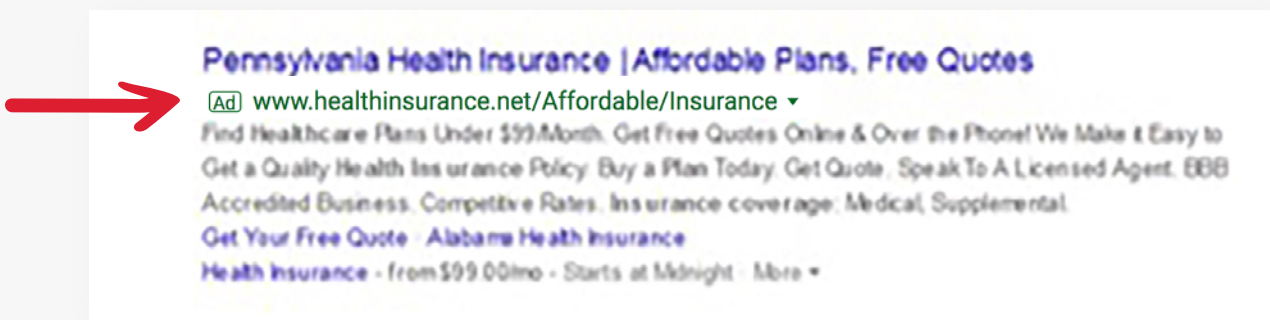


Figure 2. Bing Search Result from Philadelphia, PA on July 31, 2019: There is a light grey box around the word 'Ad,' which is also in light grey, underneath the title.⁸

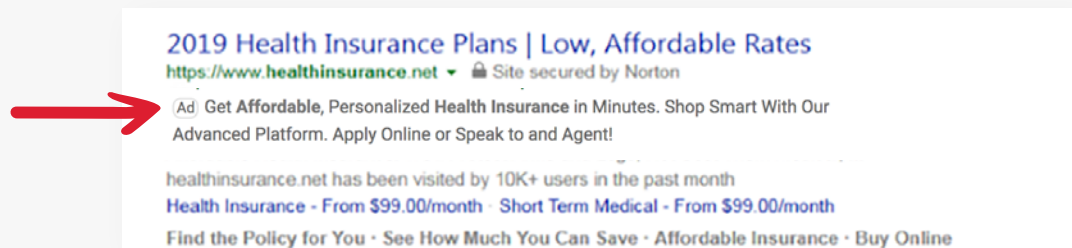
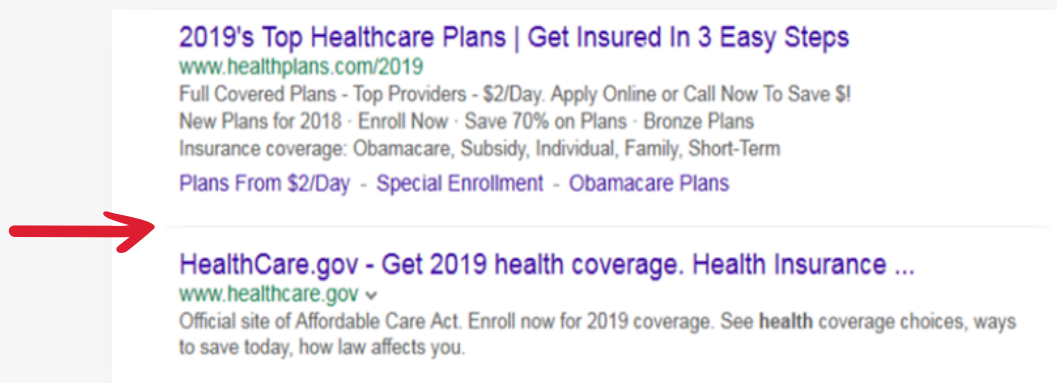


Figure 3. Yahoo Search Result from Philadelphia, PA on July 31, 2019: There is a faint grey line separating the two posts.⁹



Due to the size, format, placement and color of these designations, as well as the inconsistency across search engines, an individual may think an advertisement is actually a result that responds to their search inquiry. This is a benefit to advertisers who are interested in attracting individuals to their particular products.

In the case of an individual seeking to purchase health insurance coverage online, these often unnoticed designations can be the only difference between purchasing comprehensive coverage through a reliable website and buying a junk plan through an unreliable one. An individual's failure to identify small script or a faint line could result in their purchasing coverage that fails to protect them from extreme out-of-pocket costs. The consequences can be attributed, at least in part, to the Trump Administration, which is allowing these junk plans to be sold for 12 months with options to renew. As previously referenced, prior to 2018, individuals could only purchase these plans for up to three months, limiting the potential exposure to extreme out-of-pocket costs.

⁸ Digital Screenshot of Bing Search result, conducted from Philadelphia, Pennsylvania using search term: "affordable health insurance" (July 31, 2019).

⁹ Digital Screenshot of Yahoo Search result, conducted from Philadelphia, Pennsylvania using search term: "health insurance" (July 31, 2019).

Space Allocated for Advertisements

Further complicating an individual's ability to secure affordable, comprehensive coverage is the placement and amount of space given to paid advertisements. As evidenced through this investigation, paid advertisements typically appear at the top of the screen (before the results to the actual search inquiry appear) and take up more lines than the responses to a search inquiry. As shown in **Figure 4**, when searching for “affordable health insurance,” five paid advertisements appear before the actual responses to the search inquiry appear. An individual must scroll through these paid advertisements until they finally reach their intended search result.

Figure 4. Bing Search Result from Bethlehem, PA on July 29, 2019: Demonstrates that five advertisements appear before the search results appear.¹⁰

1 **Compare Health Insurance Plans | As Low As \$50.20/Month**
<https://www.compare-health-quotes.com/free-quote>
/Ad: Compare Health Quotes Online Now & See How Much You Can Save! Individual Plans Starting From \$50.20/Month. Family Plans Starting From \$81.10/Month. Compare-Health-Quotes.com works alongside insurance agencies to provide rates ... Insurance coverage: Platinum, Gold, Silver, Bronze, Short-term, High Deductible PL... 2019 Quotes are Here - Get Quality Health Plans - Browse Multiple Plans

2 **2019 Health Insurance | Rates from \$69/mo in PA**
https://www.affordablehealthplans.org/health/insurance_2019
/Ad: Enter Your Zip Code & Compare Prices. Get Affordable Health Insurance Quotes Now! A Comprehensive Consumer Guide to Health Insurance & Coverage Options. Your area is... has a total of 33 on-exchange plans on AffordableHealthPlans.org with ... affordablehealthplans.org has been visited by 10K+ users in the past month Insurance coverage: Affordable Healthcare, Subsidy Eligible, Private Plans

3 **2019 Health Insurance Plans | Low, Affordable Rates**
<https://www.healthinsurance.net>
/Ad: Get Affordable, Personalized Health Insurance in Minutes. Shop Smart With Our Advanced Platform. Apply Online or Speak to an Agent! Affordable Health Insurance. We'll Protect Arms and Legs, Not Cost Them Medical. ... healthinsurance.net has been visited by 10K+ users in the past month Insurance coverage: Medical, Dental, Vision, Short Term

4 **2019 Health Insurance Plans | (Pennsylvania Residents Only)**
<https://www.individualhealthquotes.com>
/Ad: Our Health Insurance Advisor Will Help You Find Coverage That Fits Your Life and Budget. Buy Online or Call for a Free Consult. Don't Go Uninsured. Get Covered Today! Enroll Now. Find the Best Healthcare Plan. Get online health insurance quotes, along with ... Insurance coverage: Individual & Family, Short-Term, Medicare, Dental, Vision Top Site For Shopping Health Insurance Plans - Compare.com

5 **Enroll Health Plans 2019 | Get Affordable Health Care**
<https://www.healthcare.org>
/Ad: Compare Health Insurance Quotes Today! Rates & Plans Available Year-Round.

Get 2019 health coverage. Health Insurance Marketplace ...
<https://www.healthcare.gov>
Official site of Affordable Care Act. Enroll now for 2019 coverage. See health coverage choices, ways to save today, how it affects you.

Affordable Health Insurance for Individuals and Families ...
<https://www.humana.com/individual-and-family>
Humana has individual affordable health insurance plans for you and your family to best meet your insurance coverage and wellness needs.

Pennsylvania Health Insurance - Find Affordable Health ...
<https://www.ehealthinsurance.com/pennsylvania-health-insurance>
Now 15, 2019 - Apply for Pennsylvania health insurance coverage at ehealthinsurance. We offer thousands of health plans underwritten by more than 150 of the nation's health insurance companies. Compare Pennsylvania health plans side by side, get health insurance quotes, apply online and find affordable health insurance today.

HealthCare.Gov ACTUAL SEARCH RESULT

10 Digital Screenshot of Bing Search result, conducted from Bethlehem, Pennsylvania using search term: “Affordable health insurance” (July 29, 2019).

The investigation also found that most paid advertisements generated by a search receive more descriptive text lines than the actual search results. As many as ten or more lines of descriptive text appear for most paid advertisements when only a few lines of descriptive text appear for results to the original search inquiry. **Figure 5** shows the results in response to a search in Pittsburgh for HealthCare.Gov. The first response is an advertisement with 10 lines of text, including the title, links and descriptive text. The result that responds directly to the individual's search only receives four lines of text, including the title, links and descriptive text.

Figure 5. Bing Search Results from Pittsburgh, PA on July 30, 2019: Displays the difference in the number of text lines that appear for paid advertisements and responses to a search result.¹¹

Paid Advertisements

- 1 HealthCare.org - Official Site | Health Insurance Marketplace
- 2 <https://www.healthcare.org>
- 3 Ad Compare 2019 Coverage Options. Enter Your Zip Code & Find the Best Plan Now!
- 4 Having a health insurance plan helps pay for some of those unexpected costs, and ...
- 5 Mobile Friendly Process · Save Time · Online Comparison · Trusted Companies
- 6 Brands: Aetna, Cigna, Kaiser, Oscar, Blue Cross
- 7 Helps consumers make smarter health care decisions. – USA Today
- 8 Marketplace Insurance
- 9 ObamaCare Sign Up
- 10 Cheapest Rates in 2019

HealthCare.Gov
ACTUAL SEARCH RESULT

- 1 HealthCare.gov - Get 2019 health coverage. Health Insurance
- 2 <https://www.healthcare.gov>
- 3 Official site of Affordable Care Act. Enroll now for 2019 coverage. See health coverage choices,
- 4 save today, how law affects you.

By providing more text about advertised products, search engines may be steering individuals to the marketed products and potentially misleading individuals into thinking the advertisements are search results. In the case of someone looking to purchase health insurance, this could have dire consequences. It could result in someone purchasing coverage that fails to meet their health care needs and budget.

11 Digital Screenshot of Bing Search result, conducted from Pittsburgh, Pennsylvania using search term: "Healthcare.gov" (July 30, 2019).

FINDING



Paid advertisements for health insurance are **often misleading** and **fail to fully disclose** very important information.

Across all searches performed, the paid advertisements that appeared in response to the search queries promoted private companies selling insurance plans or brokers that can enroll a consumer in a plan. The advertisements included pricing, website names and descriptive language that could be misleading to consumers seeking comprehensive coverage. This may cause an individual to believe the website is HealthCare.Gov when it is not. The following are examples generated during the investigation that illustrate how an individual might find advertisements misleading.

Price Discrepancies

Many of the paid advertisements promote plans at varying costs without giving any indication of benefits covered. These prices are well below national averages paid for monthly health insurance premiums.¹² For example, across the searches and platforms there were advertisements for “Obamacare Coverage from \$50/Month!”,¹³ “Full coverage from \$50/Month”,¹⁴ “As Low as \$39/Month”,¹⁵ “\$19 Health Insurance”¹⁶ and “Best Health Plans 2019- Compare Plans from \$45 a Month”.¹⁷ In order to offer these low prices, it is likely that the majority of the health insurance advertised fails to offer the comprehensive coverage promised by the ACA, thus putting purchasers in a position to be responsible for enormous bills if they have a pre-existing condition or experience an accident or serious illness.

Misleading Website Names

Paid advertisements promoting health insurance intentionally try to mislead individuals through descriptions used in the titles, website addresses, and descriptive text. This could lead an individual to believe that they have reached an official government health care website when they have not. For example, as seen in **Figure 6**, “healthcare.org,” routinely appeared as a promoted website. An individual looking for HealthCare.Gov might fail to recognize the slight variation in domain names: .Org and .Gov. These deceptive advertising practices make it more likely for an individual to click on HealthCare.Org instead of HealthCare.Gov, and to end up looking for health insurance on a website that may not actually provide comprehensive health care coverage.

12 Kaiser Family Foundation. Average Marketplace Premiums by Metal Tier, 2017-2019. Available from: https://www.kff.org/health-reform/state-indicator/average-marketplace-premiums-by-metal-tier/?currentTimeframe=0&sortModel=%7B%22colld%22:%22Average%20Lowest-Cost%20Bronze%20Premium__2019%22,%22sort%22:%22asc%22%7D

13 Digital Screenshot of Google Search results, conducted from Philadelphia, Pennsylvania using search term: “Obamacare” (July 31, 2019).

14 Digital Screenshot of Google Search results, conducted from Harrisburg, Pennsylvania using search term: “Health Insurance” (July 30, 2019).

15 Digital Screenshot of Bing Search results, conducted from Harrisburg, Pennsylvania using search term: “health insurance” (July 30, 2019).

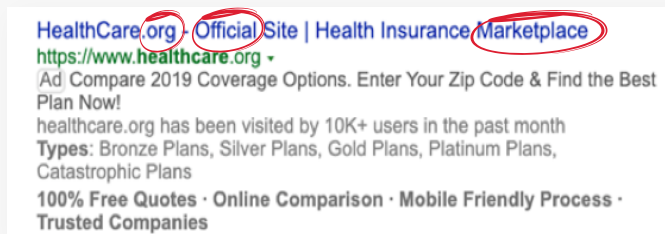
16 Digital Screenshot of Yahoo Search results, conducted from Pittsburgh, Pennsylvania using search term: “cheap health insurance” (July 30, 2019).

17 Digital Screenshot of Yahoo Search results, conducted from Pittsburgh, Pennsylvania using search term: “health insurance” (July 30, 2019).

Claiming to be “Official”

Many paid advertisements generated during the investigation contain language meant to mislead individuals into thinking they are HealthCare.Gov. Several paid advertisements contain descriptions using words like “Official,” also as seen in **Figure 6**, “Open Enrollment” or “Marketplace” or even a trademark symbol that can be mistaken for a government agency.¹⁸

Figure 6. Bing Search Result from Harrisburg, PA on July 30, 2019: Demonstrates use of .Org domain name, use of the words “Official” and “Marketplace” in the title.¹⁹



Playing Politics with Advertising

Some advertisements play on political persuasions – offering alternatives to HealthCare.Gov by using phrases such as “TrumpCare.” For example, when searching for “Obamacare” or “HealthCare.Gov” in several locations across Pennsylvania, paid advertisements touted “HealthCare.gov Alternative”, “The Non-Government Way to Get Best Health Insurance for the Lowest Cost!”, or “Healthcare.gov | 2019 TrumpCare Health Plans”. This was the case, as shown in **Figure 7**. In **Figure 8**, following a search for “HealthCare.Gov”, an advertisement appeared using the term “TrumpCare Health Plans”.

Figure 7. Google Search Result from Pittsburgh, PA on July 30, 2019: An individual searching for “Obamacare” viewed a paid advertisement for a “HealthCare.Gov Alternative.” The descriptive language in grey directs people to the “Non-Government Way” to purchase “the Best” coverage.²⁰

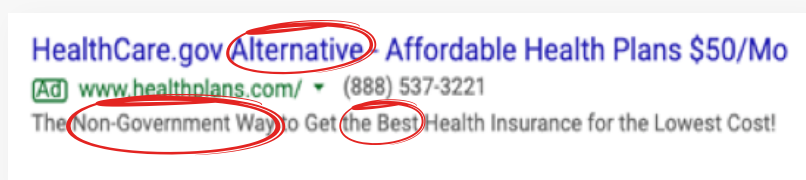
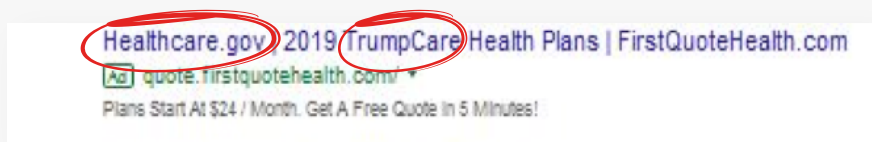


Figure 8. Google Search Result from Bethlehem, PA. The title demonstrates a paid advertisement attempting to direct an individual specifically searching for “HealthCare.Gov” to “TrumpCare.”²¹



In each of these searches, the paid advertisement seems to suggest the individual would be better off purchasing coverage through a private company rather than an unbiased source, HealthCare.Gov.²²

18 Digital Screenshot of Bing Search result, conducted from Pittsburgh, Pennsylvania using search term: “Healthcare.gov” (July 30, 2019).

19 Digital Screenshot of Bing Search result, conducted from Harrisburg, Pennsylvania using search term: “Healthcare.gov” (July 30, 2019).

20 Digital Screenshot of Google Search result, conducted from Pittsburgh, Pennsylvania using search term: “Obamacare” (July 30, 2019).

21 Digital Screenshot of Bing Search result, conducted from Bethlehem, Pennsylvania using search term: “Healthcare.gov” – (July 29, 2019).

22 Due to decisions by the Trump Administration to slash funding for ACA Navigators and rely more heavily on agents and brokers, the unbiased nature of referrals through the website may be questionable.

FINDING

Advertisements often use “HealthCare.Gov” in the website title and descriptions despite having **no affiliation** with HealthCare.Gov.



Across all search engine platforms and several search terms, the investigation found many of the paid advertisements mention “HealthCare.Gov.” This is especially true in the paid advertisements that appear when searching for “HealthCare.Gov.” As shown in **Figure 9**, several paid advertisements contained “HealthCare.gov” in the advertisement title

These results can confuse consumers into clicking on a link that fails to direct them to a HealthCare.Gov website. Instead, an individual may connect to a seller that fails to offer coverage that contains the consumer protections required by law.

Figure 9. Yahoo Search Result from Philadelphia, PA on July 31, 2019: HealthCare.Gov appears in two of the four paid advertisements.²³

Paid Advertisements

- 1 2019 HealthCare.Gov Enrollment | (Pennsylvania Residents Only)
www.individualhealthquotes.com/Pennsylvania/Enroll
Save on Health Care Plans with Blue Cross, Humana, United, and More.
Compare Free Personalized Quotes on Health Care Plans in Minutes!
A Rated by BBB · Lowest Rates Guaranteed · Free Expert Advice
Insurance coverage: Individual & Family, Short-Term, Medicare, Dental
Find the Best Healthcare Plan. Get online health insurance quotes, along v
Top Site For Shopping Health Insurance Plans - Compete.com
Aetna Health Insurance - Blue Cross Blue Shield
- 2 HealthCare.org - Official Site | Health Insurance Marketplace
www.healthcare.org
Compare 2019 Coverage Options. Enter Your Zip Code & Find the Best Plan Now!
Quick & Easy · Online Comparison · 100% Free Quotes · Sign Up or Call
Types: Bronze Plans, Silver Plans, Gold Plans, Platinum Plans
Helps consumers make smarter health care decisions. - USA Today
Marketplace Insurance Marketplace Plans
New Plans for 2019 ObamaCare Sign Up
- 3 HealthCare.gov Plans Starting @ \$9 / Week | @ BlueCross - New
www.affordable-health-insurance-plans.org
Pennsylvania Health Insurance Plans - HealthCare.gov. Options For You and Your Family. Enter Zip Code to Begin Your Free Quote. Instantly Find the Best Price!
@ Official Site 2019 Open Enrollment
Government Plans Blue Cross Blue Shield
- 4 Healthcare Gov't Plans
ObamacareUSA.org/Gov-Eligible-Plans
See if You Qualify for Coverage. Top Obamacare Plans Under \$50/Month!
Fast & Easy · New 2019 Plans · Stop the Tax Penalty
Brands: Anthem, Humana, Kaiser, More
Special Enrollment Period - Obamacare Plan Types

healthcare.gov - Get 2019 health coverage. Health Insurance ...
www.healthcare.gov -
Official site of Affordable Care Act. Enroll now for 2019 coverage.
See health coverage choices, ways to save today, how law affects you.

*HealthCare.Gov
ACTUAL SEARCH RESULT*

23 Digital Screenshot of Yahoo Search result, conducted from Philadelphia, Pennsylvania using search term: “Healthcare.gov” (July 31, 2019).

CONCLUSION

When short-term, limited duration plans could only be sold for up to three months, individuals and families could easily distinguish between health insurance plans that were in compliance with the protections afforded by the ACA and plans that failed to, for example, cover pre-existing conditions. The three month limitation made it clear that these junk plans were only ever designed to be used temporarily or as a bridge to more meaningful coverage.

That changed in 2018 when the Trump Administration began allowing junk plans to be sold for up to a full year (with an option to renew for up to three years). Now, it is easier for junk plans to be marketed to consumers. This is especially true when it comes to advertising on the internet. As a result of the proliferation of paid advertisements for health insurance coverage online, it is difficult for individuals searching for comprehensive health care plans to distinguish between websites promoting junk plans and HealthCare.Gov.

In order to help consumers sort through health insurance coverage information displayed online, search engines should consider displaying an “answer box” that directs people to HealthCare.Gov and the associated toll-free number, 1-800-318-2596. This answer box, placed in “position zero,” above all other content, would mimic the way that people are directed to other national resources and helplines.

However, corrective action by the search engines would only be a stopgap measure. To put an end to the deceptive advertising practices of health insurance companies, the Trump Administration should reverse its 2018 policy. Short term, limited duration health insurance should only be allowed to be marketed and sold to individuals and families for three months. Americans deserve to receive the consumer protections provided by the ACA in the health insurance they purchase.

**Americans
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health insurance
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